

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

RC STEVENSON

Criminal No. 3:14-CR-251-P

FACTUAL RESUME

In support of the defendant's plea of guilty to the offense in Count One of the Indictment, charging a violation of 21 U.S.C. § 841(a)(1), RC Stevenson, the defendant, his attorney, Erin Brennan, and the United States of America (the government) stipulate and agree to the following:

I. ELEMENTS OF THE OFFENSES

In order to establish the guilt of the defendant for the offense of Possession with Intent to Distribute a Schedule II Controlled Substance (cocaine-base), in violation of 21 U.S.C. § 841(a)(1) as alleged in Count One of the Indictment, the government must prove each of the following elements beyond a reasonable doubt:

First: That the defendant, did possess with the intent to distribute a mixture or substance containing a detectible amount of cocaine-base, a Schedule II controlled substance; and

Second: The defendant acted knowingly and intentionally.

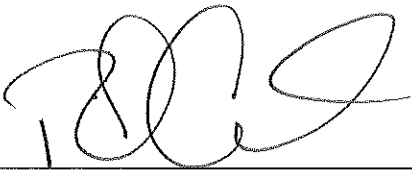
Source: Pattern Crim. Jury Instr. 5th Cir. 2.89 (2012).

Stipulated Facts

Stevenson admits and acknowledges that on or about April 17, 2014, he utilized a cellular telephone to negotiate the sale of one ounce of cocaine-base (crack cocaine) to a person he later learned was acting as a confidential informant (CI) for the Drug Enforcement Administration (DEA). Stevenson stipulates that during the afternoon of April 17, 2014, he traveled to a restaurant located at 10428 Lombardy Lane, Dallas, Texas with the express intent to engage in a drug transaction. In the parking lot of the restaurant, the defendant distributed approximately one ounce of crack cocaine to the CI in exchange for United States currency.

Stevenson stipulates that a laboratory analysis confirmed that the substance he distributed on or about April 17, 2014, was a mixture or substance containing a detectible amount of cocaine-base weighing approximately 26 grams.

This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support Stevenson's guilty plea to Count One set forth in the Indictment.

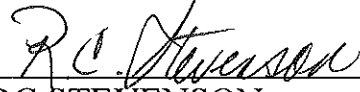


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3-16-16

Date



RC STEVENSON

Defendant

3-16-16

Date



ERIN BRENNAN

Attorney for the Defendant

3-16-16

Date